

IN THE IOWA DISTRICT COURT FOR DALLAS COUNTY

THE STATE OF IOWA

vs.

DEFENDANT Benjamin J. Hoffman

ADDRESS: [REDACTED]

West Des Moines, Iowa 50265

S.S. # [REDACTED]

D.O.B.: 09/05/89

NO.

FECR036008

Counts 1 & 2

COMPLAINT AND AFFIDAVIT

WDMPD 13-3062

The Defendant is accused of the crime of Sexual Abuse 3<sup>rd</sup> (x2) in violation of Sections 709.4(2)(b) of the Iowa Code in that the Defendant on or about the 3<sup>rd</sup> day of June, 2013, at [REDACTED] West Des Moines in Dallas County, Iowa, did perform 2 different sex acts with the victim ([REDACTED]) knowing the victim was 13 years of age while the defendant was 23 years of age.

Detective Jeff Lyon

WDMPD 250 Millis Civic Pkwy, West Des Moines Iowa 50265

Complainant:

Address:

STATE OF IOWA, COUNTY OF DALLAS, ss:

I, the undersigned, being duly sworn, state that the following facts known by me, or told to me by other reliable persons, form the basis for my belief that the Defendant committed this crime. On or about June 3, 2013 the defendant, in West Des Moines Iowa, Dallas County did perform 2 different sex acts with the victim ([REDACTED]), knowing the victim was 13 years of age at the time, while the defendant was 23 years of age. The defendant did have mouth to genital contact with [REDACTED], and the defendant had genital to genital intercourse with [REDACTED].

Signature

Subscribed and sworn to before me by the person signing this complaint and affidavit this 31<sup>st</sup> day of July, 2013.

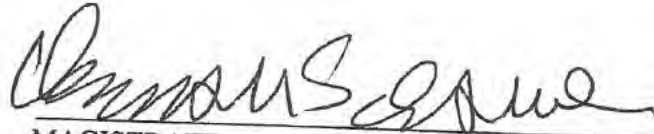


Notary Public

~~XX~~ Complaint and affidavit filed this 31st day of July, 2013, and probable cause found that the Defendant committed the offense charged.

~~XL~~ Warrant issued. Bail is set at \$ 10,000.00 cts

       Citation issued.

  
MAGISTRATE

IN THE IOWA DISTRICT COURT FOR DALLAS COUNTY

THE STATE OF IOWA

vs.

DEFENDANT Benjamin J. Hoffman

ADDRESS: [REDACTED]

West Des Moines, Iowa 50265

S.S. # [REDACTED]

D.O.B.: 09/05/89

NO. FEQ2036008

Counts 3, 4, 5

COMPLAINT AND AFFIDAVIT

WDMPD 13-3062

The Defendant is accused of the crime of Sexual Abuse 3<sup>rd</sup> (x3) in violation of Sections 709.4(2)(c)(4) of the Iowa Code in that the Defendant on or about the 3<sup>rd</sup> day of June, 2013, at [REDACTED] West Des Moines in Dallas County, Iowa, did perform 3 different sex acts with the victim [REDACTED], knowing the victim was 14 years of age while the defendant was 23 years of age.

Detective Jeff Lyon

Complainant:

WDMPD 250 Millis Civic Pkwy, West Des Moines Iowa 50265

Address:

STATE OF IOWA, COUNTY OF DALLAS, ss:

I, the undersigned, being duly sworn, state that the following facts known by me, or told to me by other reliable persons, form the basis for my belief that the Defendant committed this crime. On or about June 3, 2013 the defendant, in West Des Moines Iowa, Dallas County did perform 3 different sex acts with the victim ([REDACTED]), knowing the victim was 14 years of age at the time, while the defendant was 23 years of age. The defendant did have hand to genital contact with [REDACTED], [REDACTED] had hand to genital contact with the defendant and the defendant had genital to genital intercourse with [REDACTED].

Signature

Subscribed and sworn to before me by the person signing this complaint and affidavit this 31<sup>st</sup> day of July, 2013.

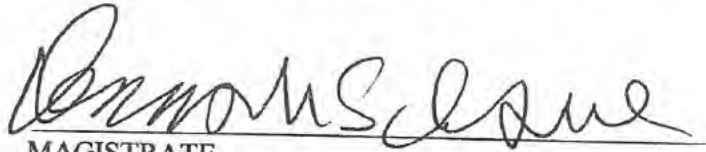


Notary Public

~~XX~~ Complaint and affidavit filed this 31st day of July, 2013, and probable cause found that the Defendant committed the offense charged.

~~XX~~ Warrant issued. Bail is set at \$10,000.00 ds w/other conditions.

       Citation issued.

  
MAGISTRATE



IN THE IOWA DISTRICT COURT FOR DALLAS COUNTY

THE STATE OF IOWA

vs.

DEFENDANT Benjamin J. Hoffman

ADDRESS: [REDACTED]

West Des Moines, Iowa 50265

S.S. # [REDACTED]

D.O.B.: 09/05/89

NO.

FECR036008  
Counts 6, 7, 8

COMPLAINT AND AFFIDAVIT

WDMPD 13-3062

The Defendant is accused of the crime of Sexual Abuse 3<sup>rd</sup> (x3) in violation of Sections 709.4(2)(c)(4) of the Iowa Code in that the Defendant on or about the 10<sup>th</sup> day of June, 2013, at [REDACTED] West Des Moines in Dallas County, Iowa, did perform 3 different sex acts with the victim ([REDACTED]), knowing the victim was 14 years of age while the defendant was 23 years of age.

Detective Jeff Lyon

WDMPD 250 Millis Civic Pkwy, West Des Moines Iowa 50265

Complainant:

Address:

STATE OF IOWA, COUNTY OF DALLAS, ss:

I, the undersigned, being duly sworn, state that the following facts known by me, or told to me by other reliable persons, form the basis for my belief that the Defendant committed this crime.

On or about June 10, 2013 the defendant, in West Des Moines Iowa, Dallas County did perform 3 different sex acts with the victim ([REDACTED]), knowing the victim was 14 years of age at the time, while the defendant was 23 years of age. The defendant did have mouth to genital contact with [REDACTED], the defendant had hand to genital contact with the [REDACTED] and the defendant had genital to genital intercourse with [REDACTED].

Signature

Subscribed and sworn to before me by the person signing this complaint and affidavit this 31<sup>st</sup> day of July, 2013.

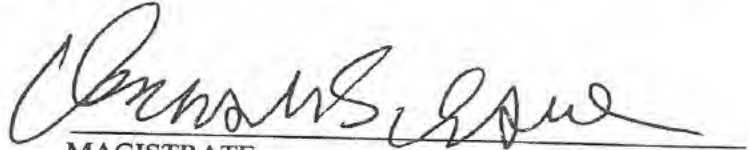


Notary Public

~~X~~ Complaint and affidavit filed this 31st day of July, 2013, and probable cause found that the Defendant committed the offense charged.

~~X~~ Warrant issued. Bail is set at \$ 10,000.00 cts with other counts -

       Citation issued.

  
MAGISTRATE

IN THE IOWA DISTRICT COURT FOR DALLAS COUNTY

THE STATE OF IOWA

vs.

DEFENDANT Benjamin J. Hoffman

ADDRESS: [REDACTED]

West Des Moines, Iowa 50265

S.S. # [REDACTED]

D.O.B.: 09/05/89

NO.

FE036008

Count 59, 10, 11

COMPLAINT AND AFFIDAVIT

WDMPD 13-3062

The Defendant is accused of the crime of Sexual Abuse 3<sup>rd</sup> (x3) in violation of Sections 709.4(2)(c)(4) of the Iowa Code in that the Defendant on or about the 6<sup>th</sup> day of July, 2013, at [REDACTED] West Des Moines in Dallas County, Iowa, did perform 3 different sex acts with the victim ([REDACTED]), knowing the victim was 14 years of age while the defendant was 23 years of age.

Detective Jeff Lyon

Complainant:

WDMPD 250 Millis Civic Pkwy, West Des Moines Iowa 50265

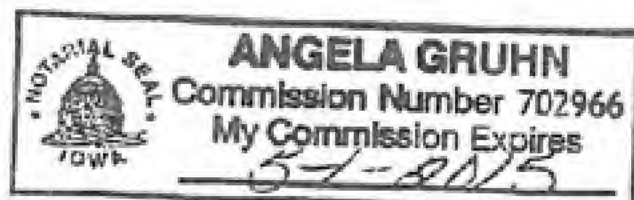
Address:

STATE OF IOWA, COUNTY OF DALLAS, ss:

I, the undersigned, being duly sworn, state that the following facts known by me, or told to me by other reliable persons, form the basis for my belief that the Defendant committed this crime. On or about July 6, 2013 the defendant, in West Des Moines Iowa, Dallas County did perform 3 different sex acts with the victim ([REDACTED]), knowing the victim was 14 years of age at the time, while the defendant was 23 years of age. The defendant did have mouth to genital contact with [REDACTED], the defendant had hand to genital contact with the [REDACTED] and [REDACTED] had hand to genital contact with the defendant.

Signature

Subscribed and sworn to before me by the person signing this complaint and affidavit this 31<sup>st</sup> day of July, 2013.

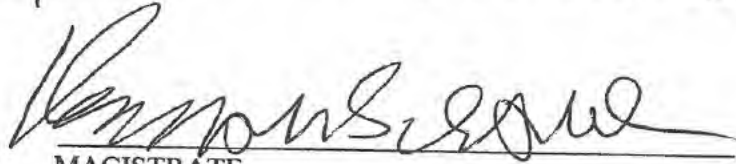


Notary Public

~~XX~~ Complaint and affidavit filed this 31st day of Jul, 2013, and probable cause found that the Defendant committed the offense charged.

~~X~~ Warrant issued. Bail is set at \$ 10,000.00 cts w/other conditions

       Citation issued.

  
MAGISTRATE



FILED  
IN THE IOWA DISTRICT COURT FOR DALLAS COUNTY

THE STATE OF IOWA

2013 JUL 31: AM 10:09

VS.

CLERK, DISTRICT COURT

NO. FECR036008

DEFENDANT Benjamin J. Hoffman :

Count 12

ADDRESS: [REDACTED] :

COMPLAINT AND AFFIDAVIT

West Des Moines, Iowa 50265 :

S.S. # [REDACTED]

D.O.B.: 09/05/89

WDMPD 13-3062

The Defendant is accused of the crime of Sexual Exploitation by School Employee in violation of Sections 709.15(3)(a) and 709.15(5)(a) of the Iowa Code in that the Defendant on or about the 3<sup>rd</sup> day of June, 2013, at [REDACTED] West Des Moines in Dallas County, Iowa, did engage in a pattern and scheme of conduct with the intent to perform a sexual act with a student, ( [REDACTED] ) age 13, with the intent and purpose of arousing the sexual desires of the school employee and or the student by engaging in sexual intercourse with [REDACTED].

Detective Jeff Lyon

WDMPD 250 Millis Civic Pkwy, West Des Moines Iowa 50265

Complainant:

Address:

STATE OF IOWA, COUNTY OF DALLAS, ss:

I, the undersigned, being duly sworn, state that the following facts known by me, or told to me by other reliable persons, form the basis for my belief that the Defendant committed this crime. On or about June 3, 2013 the defendant, in West Des Moines Iowa, Dallas County, did engage in a pattern and scheme of conduct with the intent to perform a sexual act with a student, ( [REDACTED] ) age 13, with the intent and purpose of arousing the sexual desires of the school employee and or the student by engaging in sexual intercourse with [REDACTED]. At the time, the defendant was the teacher of [REDACTED] and had been engaged in a pattern of conduct, including communicating and meeting with [REDACTED] outside of school, intending to engage in sexual conduct with [REDACTED]. On the date in question, the defendant gave [REDACTED] alcohol and then engaged in sexual intercourse with [REDACTED].

  
Signature

Subscribed and sworn to before me by the person signing this complaint and affidavit this 31<sup>st</sup> day of July, 2013.



Angela Gruhn  
Notary Public

X Complaint and affidavit filed this 31st day of July, 2013, and probable cause found that the Defendant committed the offense charged.

X Warrant issued. Bail is set at \$ 5,000.00 cts

       Citation issued.

Christine S. Gagne  
MAGISTRATE

IN THE IOWA DISTRICT COURT FOR DALLAS COUNTY  
THE STATE OF IOWA

VS.

Defendant: Benjamin J. Hoffman

Address:

West Des Moines Iowa 50265

S.S. #:

D.O.B.: 9-5-89

NO.

FECRO 36008  
Count 13  
COMPLAINT AND AFFIDAVIT

The Defendant is accused of the crime of Providing Alcohol to Minor  
in violation of Section 123.47(1) of the Iowa Code in that the Defendant  
on or about the 3rd day of June, 2002013, at [REDACTED]  
in Dallas County, Iowa did provide alcohol to victim ([REDACTED]) knowing the victim was under legal age to possess or consume  
alcohol.

Det. Jeff Lyon

Complainant

Address 250 Mills Civic Pkwy

West Des Moines Iowa 50265

AFFIDAVIT

STATE OF IOWA, COUNTY OF DALLAS, ss:

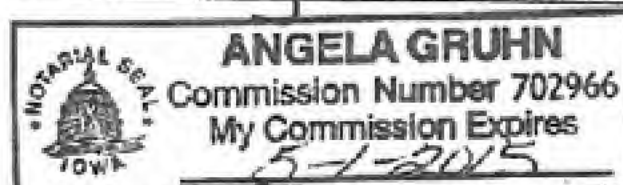
I, the undersigned, being duly sworn, state that the following facts known by me, or told  
to be by other reliable persons, form the basis for my belief that the Defendant committed this  
crime:

Defendant did provide alcohol to victim ([REDACTED]) knowing the victim was under legal age to possess or consume alcohol.

[REDACTED] was 14 years old at the time of the defendant  
providing her alcohol.

Signature

Subscribed and sworn to before me by the person signing this complaint and affidavit  
this 31st day of July, 2002013



Notary Public -- (Deputy) Clerk -- Magistrate

XX

Complaint and affidavit filed this 31st day of July, 2002013, and probable  
cause found that the Defendant committed the offense charged.

XL

Warrant issued. Bail is set at \$ 300.00 c/s.

Citation Issued

Magistrate



IN THE IOWA DISTRICT COURT FOR DALLAS COUNTY  
THE STATE OF IOWA

VS.

Defendant: Benjamin J. Hoffman  
Address: [REDACTED]  
West Des Moines Iowa 50265  
S.S. #: [REDACTED]  
D.O.B.: 9-5-89

NO. FE02036008  
Count 14  
COMPLAINT AND AFFIDAVIT

The Defendant is accused of the crime of Providing Alcohol to a Minor  
in violation of Section 123.47(1) of the Iowa Code in that the Defendant  
on or about the 3rd day of June, 200 2013, at [REDACTED]  
in Dallas County, Iowa did provide alcohol to victim ( ) knowing the the victim was under the legal age to to consume  
or possess alcohol.

Detective Jeff Lyon

Complainant

Address WDMPD 250 Mills Civic Pkwy  
West Des Moines Iowa 50265

AFFIDAVIT

STATE OF IOWA, COUNTY OF DALLAS, ss:

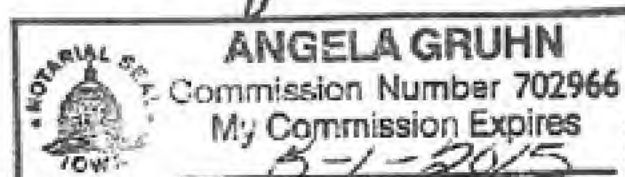
I, the undersigned, being duly sworn, state that the following facts known by me, or told  
to be by other reliable persons, form the basis for my belief that the Defendant committed this  
crime:

Defendant did knowingly provide alcohol to victim ( ) knowing the victim was under the legal age to consume  
or possess alcohol.

was 13 years old at the time the  
defendant provided her alcohol.

Signature

Subscribed and sworn to before me by the person signing this complaint and affidavit  
this 21st day of July, 200 2013



Notary Public -- (Deputy) Clerk -- Magistrate

XX Compliant and affidavit filed this 31st day of July, 200 2013, and probable  
cause found that the Defendant committed the offense charged.

XX Warrant issued. Bail is set at \$ 300.00 cash.

Citation Issued

Magistrate